

DECLARATION PURSUANT TO RULE 80, ARCP

1. My name is Lance Entrekin and I am Plaintiffs' counsel representing 71 clients who have filed Complaints in the federal multi district litigation involving ovarian cancer and mesothelioma, secondary to talcum powder usage.

2. I have been a member in good standing of the Arizona Bar for twenty eight years. My practice has focused on complex, large case litigation and multi district litigation.

3. I am also the sole author of a national treatise on malpractice published by Bloomberg BNA.

4. I have never been disciplined by any State Bar or sued for legal malpractice.

5. On August 3, 2021, I signed a co-counsel agreement with The Onder Law Firm, communicating directly with its founder. The Onder Law Firm would assist my firm and we would split the fee according to agreed terms.

6. On April 5, 2023, I learned of the proposed \$8,900,000,000 settlement and second filed bankruptcy. Neither I nor my clients have been consulted about it, to the present time.

7. I have not consulted with all of my clients since then, but I have consulted with some and none of those I have talked with support a second bankruptcy.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 7, 2023.

By: Lance Entrekin

Lance Entrekin